UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS - CENTRAL DIVISION

IN RE:

CLARENCE MITCHELL REID, A/K/A CLARENCE M. REID, Debtor Case No. 11-31802 - HJB Chapter 13

OBJECTION OF WELLS FARGO BANK, N.A. TO CONFIRMATION OF CHAPTER 13 PLAN

Now comes Wells Fargo Bank, N.A., formerly known as Wachovia Mortgage, FSB, f/k/a World Savings Bank, FSB (the "Lender"), and hereby objects to the confirmation of the Chapter 13 Plan filed by Clarence Mitchell Reid, a/k/a Clarence M. Reid (the "Debtor") on or about October 27, 2011.

In support of its Objection, the Lender states as follows:

- The Lender is a lending organization, with an address of 4101 Wiseman Boulevard, San Antonio, TX 78251.
- 2. Upon information and belief, the Debtor is a resident of Springfield, MA. The above case was commenced on October 3, 2011, by the filing of a petition for relief pursuant to Chapter 13 of Title 11 of the United States Code.
- 3. The Debtor and Avril E. Reid (the "CoDebtor") are the owners of that certain real estate and improvements located at 37 Waldorf Street, Springfield, Massachusetts (the "Premises").
- 4. The Lender is the holder of a mortgage (the "Mortgage") on 37 Waldorf Street, Springfield, Massachusetts, granted by the Debtor and the CoDebtor to the Lender dated January 20, 2006, on the Premises, securing a promissory note granted by the Debtor (the "Note") dated January 20, 2006, in the original principal amount of \$120,000.00. The Mortgage is recorded with the Hampden County Registry of Deeds, in Book 15654 at Page 483.